

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHRISTINE GRABLIS, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ONECOIN LTD., a foreign corporation;  
RUJA IGNATOVA, an individual;  
KONSTANTIN IGNATOV, an individual;  
SEBASTIAN GREENWOOD, an individual;  
and MARK SCOTT, an individual;

Defendants.

Case No.: 1:19-cv-04074-VEC

Hon. Valerie E. Caproni

**NOTICE OF MOTION OF PLAINTIFF CHRISTINE GRABLIS AND CO-MOVANT  
DONALD BERDEAUX FOR APPOINTMENT AS LEAD PLAINTIFFS AND  
APPROVAL OF SELECTION OF COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE  
ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that Plaintiff Christine Grablis, an individual (“Grablis”), and Co-Movant Donald Berdeaux, an individual (“Berdeaux”), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 7(b) and Local Civil Rule 7.1, shall move before this Honorable Court for entry of an Order: (i) appointing Grablis and Berdeaux as Lead Plaintiffs pursuant to the Private Securities Litigation Reform Act of 1995, as amended (the “PSLRA”), 15 U.S.C. § 77z-1(a)(3)(B); (ii) approving their selection of Silver Miller and Levi & Korsinsky, LLP (“Levi & Korsinsky”) as Co-Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Plaintiff Grablis and Co-Movant Berdeaux shall rely on the enclosed memorandum of law and Declaration.

A proposed form of Order is submitted herewith for the Court’s convenience.

*[Signature on Following Page]*

Dated: July 8, 2019

Respectfully Submitted,

**LEVI & KORSINSKY, LLP**

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*Counsel for Plaintiff Christine Grablis and  
Co-Movant Donald Berdeaux, and  
[Proposed] Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was electronically filed with the Clerk of Court on this 8th day of July 2019 by using the CM/ECF system and that a true and correct copy will be served via electronic mail to: **WENDY SCHWARTZ, ESQ. and LINDSAY A. BUSH, ESQ.**, BINDER & SCHWARTZ LLP, *Counsel for Defendant Mark Scott*, 366 Madison Avenue - 6th Floor, New York, NY 10017; E-mail: [WSchwartz@BinderSchwartz.com](mailto:WSchwartz@BinderSchwartz.com); [LBush@BinderSchwartz.com](mailto:LBush@BinderSchwartz.com).

/s/ William J. Fields

William J. Fields